

Exhibit C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARK I. SOKOLOW, et al.,
Plaintiffs,

v.

PALESTINE LIBERATION ORGANIZATION,
et al.,
Defendants.

No. 1:04-cv-0397 (GBD) (RLE)

DECLARATION OF BILAL MOUSA KAMAL

Pursuant to 28 U.S.C. § 1746, I, BILAL MOUSA KAMAL, declare under penalty of perjury as follows:

1. I am over eighteen years old and am competent to make this declaration. Unless otherwise stated herein, the facts set forth below are based on my personal knowledge.
2. I am a lawyer in Palestine and I am the legal counsel for Al Sanabel for Trade and Investment Co. ("Sanabel") a company whose head office is located in Ramallah, Palestine. I have been the legal counsel for Sanabel for 4 years.
3. I have reviewed a Declaration of Eitan Arusy, dated July 9, 2015, which I understand has been submitted to the Court in the lawsuit captioned above.
4. The assertions made in Mr. Arusy's Declaration concerning the nature and extent of Sanabel's holdings, and Mr. Arusy's allegation in his Declaration that the assets of Sanabel are "PLO assets," are false.

5. I have personal knowledge of the following facts concerning Sanabel, which refute Mr. Arusy's false assertion that the PLO owns or benefits from Sanabel and that Sanabel has extensive assets:

- The PLO is not a shareholder in Sanabel. Neither the Palestinian Authority nor the PLO has oversight or control over Sanabel or its assets.
- Sanabel is owned, operated and managed as a private company by individuals in their personal capacity.
- The company is not managed nor owned for the benefit of the PLO. Neither Sanabel nor the individual shareholders, of course, are defendants in the lawsuit captioned above.
- Sanabel holds only domestic investments within Palestine. These include shares of Palestine Insurance Company, and the Palestinian Stock Exchange. The total current market value of Sanabel's assets and investments is approximately \$5 million. For the avoidance of doubt, I expressly deny Mr. Arusy's assertion that "Sanabel has a significant amount of liquid assets, estimated to be around \$200 million USD."
- The reference in Sanabel's registration certificate, that the company was established "with paid capital of USD 50,000,000.00" does not mean that Sanabel ever had US\$50 million in cash. Instead, it refers to Sanabel's authorized share capital.
- For the avoidance of doubt, I further confirm that:
 - i. Neither Sanabel nor any of its subsidiaries "is distributing bananas from CAR to Europe with revent stream of hundreds of millions of USD annually;
 - ii. Sanabel doesn't own real estate in France, Bulgeria, Czech Republic, Switzerland, and the UK; and

iii. Adnan Jumma Kireh is not a “nominee on behalf of Sanabel” with respect to an office building in London. In fact, Sanabel doesn’t have or own an office building in London.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 22, 2015.



BILALMOUSA KAMAL